

Secretary Mike Chrisman,  
California Resources Agency  
1416 Ninth Street, Ste. 1311,  
Sacramento, CA 95814

February 22, 2005

Re: SCAG's Input into the California Environmental Quality Act (CEQA) Improvement  
Advisory Group

Dear Secretary Chrisman,

Thank you for this timely initiative to review the role of CEQA in encouraging efficient land use patterns in the development of housing and infrastructure while protecting valuable habitat and productive farmland. As the designated Metropolitan Planning Organization (MPO) for the Southern California region, SCAG has strived to better integrate the environmental dimensions of regional planning in managing patterns of growth.

SCAG's Southern California Compass project initiated an ongoing growth visioning process that sought to elicit and incorporate multiple stakeholder assessments of potential alternative land use patterns. SCAG's urban infill and transit-oriented development strategy advocates concentrating growth in urbanized cores in ways that minimize environmental impacts.

In this light, SCAG would like to strongly recommend suitable adjustments to the CEQA process that better facilitate such a regional approach to environmental planning. Below are three points that SCAG would like to see incorporated into the proposed discussion on improving CEQA.

1. Reformulate CEQA's cumulative impact analysis provisions to provide a clear imperative for regional environmental systems analysis. The preparation of such a regional environmental issues analysis should provide projects within its system boundaries with substantial relief in terms of the environmental analysis and mitigation assessment subsequently deemed necessary by CEQA. Thus, for example, SCAG's Environmental Impact Review for the 2004 Regional Transportation Plan should fulfill significant portions of the cumulative impact analysis for projects that fall under SCAG's proposed 2% Strategy. This strategy advocates that the bulk of future development be concentrated within two percent of the region's land-mass, within its urbanized cores.
2. CEQA should recognize certain forms of development -- generally characterized as sustainability planning and smart growth, such as mixed-use urban infill, transit-oriented development, and low-impact development -- as being inherently desirable forms of development and incentivize their implementation.

3. Certain forms of development -- generally characterized as brownfield development-- are inherently risky and expensive in terms of environmental liability and uncertainty, and CEQA should make adequate provisions to compensate for this liability.

We look forward to participating in the proposed dialogue on the potential for improving CEQA.

Sincerely,

Mark A. Pisano  
Executive Director  
Southern California Association of Governments  
818 W. 7th Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017